

APPENDIX 8

CERTIFICATIONS OF BLEACH PLANT OPERATION

December 28, 2005
Beth DeHaas
Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

Subject: Dioxin/Furan Certification (PCS Code 95799) Dear Ms. DeHaas:

Special Condition L of the MEPDES Permit requires an annual certification in lieu of monthly sampling and testing of the bleach plant effluent. This correspondence provides the required certification.

Neither chlorine nor sodium hypochlorite was used in the bleach plant in the past year. The chlorine dioxide plant has been operated in a manner consistent with recommendations for generating minimal chlorine. First, this is satisfied because the "R8" chemistry that Rumford uses is known to be a chlorine dioxide generation process that generates negligible chlorine and the manufacturer of the generation plant annually visits the plant.

Shortly after receiving the water license, the mill has instituted written procedures for purchasing defoamer. The current defoamer has been tested and any future defoamer change or trial request is accompanied by a written request for precursor information that must be tested and less than the numeric standard adopted by Canada to be introduced into the mill.

Fundamental design changes to the C102 stages of the bleach plants have not been made this year. Attached is the required language certified by an appropriate company official.

Sincerely,
Mike Sinclair
NewPage Corporation
35 Hartford Street, Rumford, ME 04276

Annual Dioxin/Furan Certification Required per Special Condition L.

This is to certify that:

- Elemental chlorine or hypochlorite was not used in the bleaching of pulp.
- The chlorine dioxide (ClO₂) generating plant has been operated in a manner which minimizes or eliminates byproduct elemental chlorine generation per the manufacturers/suppliers recommendations.
- Documented and verifiable purchasing procedures are in place for the procurement of defoamers or other additives without elevated levels of known dioxin precursors.
- Fundamental design changes to the ClO₂ stages of the bleach plant have been reported to the Department prior to implementation and said reports have explained the reason(s) for the change and any possible adverse consequences if any.

Gary Curtis, Maine Operations Date 12/28/05

SAPPI Fine Paper North America S.D. Warren Company
1329 Waterville Road
Skowhegan ME 04976
March 6, 2006
Te +1 207 453 9301 Fax +1 207 238 3485

Ms. Denise Behr
Maine Department of Environmental Protection
Bureau of Land & Water Quality
17 State House Station
Augusta, ME 04333-00 17

Re: MEPDES Permit #ME0021521 Dear Ms. Behr:

Special Condition P was added to Somerset's MEPDES Permit in an administrative modification issued by Gregg Wood on July 12, 2005. This condition reduces the frequency of bleach plant dioxin monitoring from once per month to once per year provided that Somerset submit an annual certification to the Department regarding certain bleach plant operating conditions and purchasing procedures. Therefore Somerset certifies the following for calendar year 2005:

- a) Elemental chlorine gas or hypochlorite was not used in the bleaching of pulp.
- b) The chlorine dioxide (C102) generating plant has been operated in a manner which minimizes or eliminates byproduct elemental chlorine generation per the manufacturers/suppliers recommendations.
- c) Purchasing procedures are in place for the procurement of defoamers or other additives without elevated levels of known dioxin precursors.
- d) Fundamental design changes to the C102 plant and/or bleach plant operation have been reported to the Department and said reports explained the reason(s) for the change and any possible consequences if any.

In regards to bullet (d) above there were no fundamental design changes to the C102 plant and/or bleach plant operation during calendar year 2005.

In addition to this certification as you requested attached is a table summarizing the bleach plant dioxin results for 2005.

If you require additional information or have any questions please contact me.

File: XV.F.2

Sincerely,

Thomas E. Griffin
Environmental Manager